

Exhibit A

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS HOUSTON DIVISION**

OKOLO JOSEPH AJIODO,

Plaintiff,

v.

H. E. BUTT GROCERY CO.,

Defendant.

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CIVIL ACTION NO. 4:19-cv-00237

DECLARATION OF SANDRA HERRERA

1. “My name is Sandra Herrera. I am over eighteen years of age, of sound mind, have never been convicted of a felony, and am competent in all respects to make this declaration. The facts stated herein are within my personal knowledge, based on information obtained from other persons, reasonable inquiry, and Company business records, and are all true and correct.

2. During all relevant periods set forth herein, I was employed at HEB Grocery Company, L.P. (“H-E-B” or “the Company”) as Senior Partner Relations Advisor overseeing human resources matters. In this position, I am responsible for employee relations matters, including but not limited to, addressing questions and concerns related to payroll and benefits and investigating and addressing employee complaints related to alleged violations of company policies.

3. H-E-B is an independently owned grocery retailer, with stores across Texas and in Mexico. H-E-B has long valued diversity in its workforce, and is fully committed to the principle of equal employment opportunity for all of its employees. H-E-B requires all of its employees to agree to arbitrate all employment related disputes as a condition of employment with H-E-B.

4. Okolo Ajiodo submitted a signed application for employment to H-E-B on March 8, 2003. A true and correct copy of Mr. Ajiodo’s application is attached to this declaration. H-E-B offered Mr. Ajiodo a position as a Customer Service Assistant, which Mr. Ajiodo accepted.

5. Mr. Ajiodo worked for H-E-B until his termination on June 24, 2017. H-E-B terminated Mr. Ajiodo for violating H-E-B’s Standards of Conduct. Neither Mr. Ajiodo’s race nor his national origin played any role in the decision to separate his employment.

6. Attached to this declaration is a true and correct copy of Mr. Ajiodo’s signed application containing his agreement to arbitrate. This document is an H-E-B business record, which is kept by H-E-B in the regular course of business, and it was the regular course of business of H-E-B for an employee or representative of H-E-B with knowledge of the acts, events, or

conditions recorded in the record to make the record or to transmit information to be included in the record; and the record was made at or near, or reasonably soon after, the time of the acts, events, or conditions recorded. The sources of information of, and the method and circumstances of the preparation of, the attached record were in all respects trustworthy. The record attached is an exact duplicate of the original as maintained in H-E-B's files.

I declare under penalty of perjury that the foregoing is true and correct.”

Executed on March 20, 2019.

Sandra A Herrera
Signature

Sandra A. Herrera
Printed Name